

**U.S. DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

SWEIGERT	CIVIL CASE #:
V.	1:18-CV-08653-VEC-SDA
GOODMAN	JUDGE VALERIE E. CAPRONI

**PLAINTIFF SWEIGERT'S RESPONSE TO**  
**DEFENDANT'S EMERGENCY MOTION**  
**ECF DOC. 305 and 307**

MAY IT PLEASE THE COURT, this document RESPONDS to the Defendant's improper  
“EMERGENCY MOTION”, ECF doc. 305 and 307.

The undersigned hereby attests under penalties of perjury that the above statements are true and correct to the best of the undersigned's knowledge and memory on this the sixteenth day of August (8/16), two thousand and twenty-one (2021). A certificate of service is provided on the last page.



**D. GEORGE SWEIGERT**  
*Pro Se Non-Attorney*  
**GENERAL DELIVERY**  
**NEVADA CITY, CA 95959**

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## **BACKGROUND**

Defendant's latest EMERGENCY MOTION is merely a rehash of instances and events outside the four corners of the complaint and this litigation. The motion and supplement (ECF doc. **305** and **307**) are improper as it sets forth immaterial, irrelevant and hearsay evidence and cites no relevant legal authority for the jumbled request.

The lion's share of these papers (**305/307**) relies on events that possibly impact Defendant's legal counsel in another lawsuit. That person is John H. Snyder, esq. who operates a software discovery company for litigation support named AGNES INTELLIGENCE, named after his daughter. In this context, Mr. Snyder has posted pictures of his daughter on the public platform TWITTER. The marketing insinuation is that Mr. Snyder's company, AGNES, is represented by his daughter as a folksy trademark. **EXHIBIT ONE**

The Court should note that Mr. Snyder appeared as a social media sidekick, and not as an attorney, on two of the Defendant's COUNTER LAWFARE REPORT social media podcasts.



The photograph that apparently caused Mr. Synder so much angst (**ECF 307**) is attached as **EXHIBIT TWO.** The Court will observe that this parody collage coalesces three (3) photographs together of social media posts about Mr. Snyder's company, AGNES (the name of his daughter).

The black box over the child's lower face (**Exh. Two**) was published with the photograph to obscure this face as a courtesy, the entire face is redacted with a yellow box for this exhibit. The straight jacket that Mr. Snyder seems to be wearing is simply a mockery of the straight jacket placed on the Plaintiff by the Defendant for the notorious "Deep State Dunces" coffee cup produced with the Plaintiff's persona by the Defendant. The entire social media blog post page where this collage appears was labeled OPINION AND EDITIORIAL.

Mr. Snyder also appeared in a COUNTER LAWFARE REPORT with the national public figure, repeatedly labeled a vexatious litigant and attorney, Larry Klayman, esq.



It is instructive to note that Mr. Klayman has at least nine (9) instances of litigation in the Superior Court for the County of Palm Beach, Florida where he appears as a *pro se* litigant. All these cases are for defamation, and all have been used to garner headlines and social media traction.

Such circumstances have led to national calls for the disbarment of Mr. Klayman ( <https://abovethelaw.com/2020/03/nutbag-lawyer-larry-klayman-files-20-trillion-suit-against-china-for-coronavirus-bioweapon/> ).

Meanwhile, the Court of Appeals for the District of Columbia has upheld a \$2.3 million jury verdict in the matter of Mr. Klayman's former employer – Judicial Watch. Said litigation lasted 14 years. ( [https://www.cadc.uscourts.gov/internet/opinions.nsf/5965488C340EEE0485258722004E122D/\\$file/19-7105-1908320.pdf](https://www.cadc.uscourts.gov/internet/opinions.nsf/5965488C340EEE0485258722004E122D/$file/19-7105-1908320.pdf) )

Mr. Klayman can be considered the father of “stunt litigation”, that is the filing of complaints to draw news media headlines to support requests for financial donations by Klayman and the Defendant.

Mr. Klayman will usually abuse the *pro se* process and draft a complaint, find an unwitting stooge to file it, claim it is a class action lawsuit and begin the social media chest pounding. In *Siaka Massaquoi vs. United States*, U.S. District Court for the Central District of California (Case No. LACV21-5722) files on July 15, 2021, the complaint was accompanied by Mr. Klayman’s inclusion as a *pro hac vice* attorney. The court later removed Mr. Klayman’s name from the *pro hac vice* attestations as he is banned from such practice in that district.

### **EXHIBIT THREE.**

Mr. Klayman’s long history of stunt litigation is documented in **EXHIBIT FOUR.**

The Defendant’s papers (**305/307**) also misrepresent the warnings sent to law enforcement in Philadelphia, Pennsylvania by the Plaintiff concerning the “Third Continental Congress”, which openly states its mission is to re-write the U.S. Constitution. This event was partly organized by the Defendant and his ghost-writing social media side-kick Larry Klayman, esq. **EXHIBIT FIVE.**

Klayman, an avowed right wing vexatious attorney, has access to a wide variety of armed “useful idiots”. Klayman (<https://www.politico.com/news/2020/09/16/has-larry-klayman-finally-gone-too-far-416353>) continuously broadcasts on the Defendant’s social media channels that the “tree of liberty needs to be fed with the blood of tyrants” and that if federal jurists don’t comply with his expectations, then “matters will be taken into our hands”.

This rhetoric is a mirror of the targeted political assassination rhetoric aimed at federal judges by radio shock jock Hal Turner (*United States v. Turner*, 720 F.3d 411). Mr. Turner, as is the Defendant, is a practitioner of stochastic terrorism, “stochastic terrorism is the use of mass communications to incite random actors to carry out violent or terroristic acts that are statistically predictable but individually unpredictable.” (<http://stochasticterrorism.blogspot.com/>) This amplifies the determination that a social media group such as Q Anon can be classified as a “domestic terrorism” threat. Both Klayman and the Defendant have been cited as pushing anti-Muslim rhetoric which smacks of racist and bigoted opinions.

Mr. Klayman appears on average in 30% of all CROWDSOURCE THE TRUTH broadcasts and makes no apologies for his longstanding admiration and loyalty to Nevada Rancher Cliven Bundy (special guest in Philadelphia, PA).

In 2016 Bundy’s sons (Ammon Bundy, Ryan Bundy) were both directly responsible for the death of Lavoy Finicum ([https://en.wikipedia.org/wiki/LaVoy\\_Finicum](https://en.wikipedia.org/wiki/LaVoy_Finicum)) in Oregon during the armed militia take-over of federal property. The Oregon shooting followed the 2014 armed confrontation in Nevada between agents of the Bureau of Land Management and the Cliven Bundy militia ([https://en.wikipedia.org/wiki/Cliven\\_Bundy](https://en.wikipedia.org/wiki/Cliven_Bundy)). All of these men are close associates of Larry Klayman and all have appeared on the CROWDSOURCE THE TRUTH show (<https://www.politico.com/news/2020/09/16/has-larry-klayman-finally-gone-too-far-416353>).

## **ARGUMENT**

### **Rule 35**

Federal Rule of Civil Procedure Rule 35 provides authority for a court to order a party “whose mental or physical condition. . . is in controversy to submit to . . . a mental examination by a suitably licensed or certified examiner.” Fed. R. Civ. P. 35(a). In order to justify the need for a Rule 35 independent medical examination (“IME”), a party must have placed his or her mental status in controversy and there must be a showing of good cause for the order. *Herrera v. Lufkin Industries, Inc.*, 474 F.3d 675, 689 (10th Cir. 2007). The requirement of good cause is not a formality; instead, the Court must genuinely balance the need for the information with the right to privacy and safety of the party. *Schlagenhauf v. Holder*, 379 U.S. 104, 118 (1964).

Rule 35, as contrasted with the other discovery provisions, is distinct in its requirements that the condition as to which the examination is sought be “in controversy,” and that the movant affirmatively demonstrate “good cause” for the examination. *Schlagenhauf v. Holder*, 379 U.S. 104, 117 (1964); *Lahr v. Fulbright & Jaworski, L.L.P.*, 164 F.R.D. 196, 198 (N.D. Tex. 1995), aff’d, 164 F.R.D. 204 (N.D. Tex. 1996).

When deciding whether to order a mental examination of a party, a district court’s analysis first begins with the Supreme Court’s decision in *Schlagenhauf v. Holder*, 379 U.S. 104, 116-122 (1964). The Schlagenhauf Court reminded district courts that, not only is a Fed. R. Civ. Proc. Rule 35 motion to compel subject to the general discovery limitations set forth in Rules 26(b) and 30(b), but it also contains both an “in controversy” and a “good cause” restriction. In other words, the party seeking to compel the examination must show that the subject matter of the proposed examination is in controversy in the pending lawsuit and that good cause exists for the exam.

The “in controversy” and “good cause” requirements “are not met by mere conclusory allegations of the pleadings - nor by mere relevance to the case - but require an affirmative showing by the

movant that each condition as to which the examination is sought is really and genuinely in controversy and that good cause exists for ordering each particular examination. *Schlagenhauf*, 379 U.S. at 118.

Accordingly, Rule 35 "requires discriminating application by the trial judge, who must decide, as an initial matter in every case, whether the party requesting a mental examination has adequately demonstrated the existence of the Rule's requirements of 'in controversy' and 'good cause,' which requirements ... are necessarily related." Id. at 118-19 (citation omitted). See also *Large v. Our Lady of Mercy Medical Center*, No. 94 Civ. 5986 (JGK)(THK), 1998 WL 65995, \*6 (S.D.N.Y. 1998) (good cause usually exists where party has placed mental condition in controversy); *Duncan v. Upjohn Co.*, 155 F.R.D. 23, 25 (D. Conn. 1994) ("By claiming ongoing psychiatric harm cause by the negligence of the defendant, therefore, the plaintiff has placed his mental state in controversy, which in turn constitutes good cause for ordering a psychiatric examination...").

The decision as to whether such showing was made, and thus that an examination is warranted, ultimately lies in the sound discretion of the trial court. See, e.g., *Stinchomb v. United States*, 132 F.R.D. 29, 30 (E.D. Pa. 1990).

Numerous courts have considered whether defendants in civil rights cases are entitled to conduct mental examinations of plaintiffs who, to some extent, have put their mental health in controversy. See *Bridges v. Eastman Kodak Co.*, 850 F. Supp. 216, 221-22 (S.D.N.Y. 1994) (and cases cited within). "While there seems to be no hard and fast rule that can explain these different results, most cases where mental examinations have been allowed have either involved a separate tort claim for emotional distress ... or an allegation of ongoing severe mental injury..." Id. at 222. See also *Duncan v. Upjohn*, 155 F.R.D. 23, 25 (D. Conn. 1994) ("Since plaintiff

claims that he suffers ongoing psychiatric harm, the plaintiff has placed his psychiatric state in controversy"); *Hodges v. Keane*, 145 F.R.D. 332, 334 (S.D.N.Y. 1993) (where Judge Sotomayor, before being elevated to the Second Circuit, held that "[h]ad plaintiff elected to assert the existence of an ongoing mental illness resulting from defendants' acts or omissions, defendants would undoubtedly be entitled to an order under Rule 35(a) allowing them to conduct a psychiatric evaluation to determine the existence of such a condition") (citation omitted).

*Bourne v. City of Middleton*, No. 3:11CV309 (DJS), 2012 U.S. Dist. LEXIS 178610, at \*6-7 (D. Conn. Dec. 18, 2012) (rejecting defense counsel's request for a mental examination where plaintiff did not include a claim for intentional or negligent infliction of emotional distress or a claim alleging any specific form of mental or psychiatric injury or disorder within her pleadings).

*Houghton v. M & F Fishing, Inc.*, 198 F.R.D. 666, 668-70 (S.D. Cal. 2001) (plaintiff did not place his mental condition in controversy and does not seek to recover damages for mental injury caused by a shipboard injury other than "garden-variety" emotional distress despite alleging that he is permanently disabled)

*Shumaker v. West*, 196 F.R.D. 454, 457 (S.D.W. Va. 2000) (motion for mental examination denied because the motion was untimely and defendant did not show good cause because there was "ample evidence" already available from which defendant could obtain the information sought).

## **CONCLUSION**

For these reasons the Court should deny Defendant's EMERGENCY MOTION as articulated in papers ECF 305 and 307.



**D. GEORGE SWEIGERT**  
*Pro Se Non-Attorney*  
**GENERAL DELIVERY**  
**NEVADA CITY, CA 95959**

**CERTIFICATE OF SERVICE**

**The undersigned hereby attests under penalties of perjury that copies of this communication have been transmitted via electronic mail message to the following parties on the sixteenth day of August (8/16) two thousand and twenty-one (2021).**

Clerk of the Court, Room 200 <a href="mailto:temporary_pro_se_filing@nysd.uscourts.gov">temporary_pro_se_filing@nysd.uscourts.gov</a>	Jason Goodman, CEO <a href="mailto:truth@crowdsourcethetruth.org">truth@crowdsourcethetruth.org</a>
--	--



**D. GEORGE SWEIGERT**  
*Pro Se Non-Attorney*  
**GENERAL DELIVERY**  
**NEVADA CITY, CA 95959**

## EXHIBITS

The Plaintiff hereby avers, under the penalties of perjury, that the following exhibits are verified as true and correct copies of the original source documents on the sixteenth day of August (8/16) two thousand and twenty-one (2021).



**D. GEORGE SWEIGERT**  
*Pro Se Non-Attorney*  
**GENERAL DELIVERY**  
**NEVADA CITY, CA 95959**

## **EXHIBIT ONE**

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<https://www.linkedin.com/in/johnsnyder> :

**John H. Snyder - Founder - Agnes Intelligence | LinkedIn**  
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Harvard-trained NYC trial lawyer turned technologist. Founder of **AGNES**, the world's most powerful AI-enabled business and forensic intelligence platform for ...

<http://www.jhs.nyc/johnsnyder> :

**The Trial Lawyer — The AI Law Firm**  
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**John H. Snyder (@AgnesChief) | Twitter**  
Founder & Chairman of **AGNES** Intelligence. "The Hacker's Lawyer." Pioneer of the Law & Data Science Movement. Designer of Machine Learning systems.

<https://www.agnesintel.com/for-litigation-finance> :

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Plaintiffs' counsel can use **AGNES** to make all available case data accessible and readily searchable — enabling Funders to ... **John H. Snyder** PLLC, 2010-18

**Videos** :

 [Transforming e-Discovery: An Interview with John Snyder ...](#)  
YouTube · Aragon Research  
Jan 28, 2019

 [Highwire to Harvard: Agnes Intelligence: Legal Media Artificial ...](#)  
YouTube · Startup Hunter  
Mar 16, 2019

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<https://www.f6s.com/agneschief> :

**John Snyder | CEO @Agnes Intelligence | F6S Profile**  
Technologist, Lawyer, Founder of **AGNES** Intelligence I invented, patented, and brought to market an entirely ... Founder @**John H. Snyder** PLLC · Co-Founder.

## **EXHIBIT TWO**



# COUNTER LAWFARE

HARVARD  
LAW SCHOOL

## **EXHIBIT THREE**

[https://www.wfmz.com/news/pr\\_newswire/pr\\_newswire\\_entertainment/fbi-director-agents-bureau-sued-in-aftermath-of-jan-6-reports-freedom-watch/article\\_73845d66-256f-55cf-9329-5daf60736160.html](https://www.wfmz.com/news/pr_newswire/pr_newswire_entertainment/fbi-director-agents-bureau-sued-in-aftermath-of-jan-6-reports-freedom-watch/article_73845d66-256f-55cf-9329-5daf60736160.html)

## FBI Director, Agents & Bureau Sued In Aftermath Of Jan. 6, Reports Freedom Watch

- By Freedom Watch
- Jul 15, 2021 Updated Jul 27, 2021

LOS ANGELES, July 15, 2021 /PRNewswire/ -- Hollywood actor, Siaka Massaquoi, a conservative black activist as well as entertainer, filed suit in the U.S. District Court for the Central District of California (Case No. LACV21-5722) on July 15, 2021, over an allegedly illegal unconstitutional raid by the FBI and its agents, as ordered by and at the direction of FBI Director Christopher Wray, as part and parcel to the bureau's post January 6, 2021, round up of even peaceful protestors who were in Washington, D.C., in support of President Trump and a nation free of corruption.

The complaint, which is filed as a class action for all persons who were in the nation's capital to peacefully protest, but who in the aftermath of January 6, 2021, have been rounded up, had their homes and businesses violated and broken into, their property such as cell phones and computers seized without probable cause, arrested, prosecuted, denied bail, or some even thrown into solitary confinement while awaiting trial, alleges the violation of First, Fifth, and Fourteenth constitutional rights by the defendants.

Larry Klayman, the chairman and general counsel of Freedom Watch, which represents Mr. Massaquoi, and will seek entry pro hac vice into the case had this to say:

## Local Trending News

"The FBI, as alleged, is being used by the Biden-Harris Justice Department as the administration's and the left's "personal Gestapo," to stifle free speech and dissent over the near total leftist, socialist and borderline communist takeover of our body politic. And, FBI Director Wray bears personal legal responsibility and liability for these unconstitutional acts, which he has bragged about in public testimony before Congress – branding the peaceful protestors as mostly white domestic terrorists.

The lead plaintiff, Mr. Massaquoi, was not arrested, and was at the Capitol peacefully. He and his family and friends were handcuffed in front of children, denied right of counsel, and allegedly illegally questioned. To make matters worse, his cell phone and computers were seized, preventing him from carrying out his trade and profession and well as personal matters. The defendants have refused to return his property.

Mr. Massaquoi will be present at the press conference and will speak to the unconstitutional and illegal tactics of the Defendants, for which they must be held to legally account. Mr. Klayman, a former U.S. Department of Justice prosecutor during the Reagan administration, will also speak.

Media Contact: Justin Baronoff, 561-750-9800, [justin@transmediagroup.com](mailto:justin@transmediagroup.com)

 View original content:<https://www.prnewswire.com/news-releases/fbi-director-agents--bureau-sued-in-aftermath-of-jan-6-reports-freedom-watch-301335211.html>

SOURCE Freedom Watch

## **EXHIBIT FOUR**

<https://trackingmeroz.wordpress.com/>

Analyzing The Portrait of the Legal Illusionist against the background of Richard Mellon Scaife's Anti-Clinton funding  
Posted on August 15, 2021

*"Plaintiff's own words exhibit his hostility and lack of professionalism, all based on oppression and vexation as evidenced in one of many e-mails to the undersigned, wherein he stated on November 24, 2020, "P. S. There is a long history of this communist leftist rag defaming me.....so my offer is more than reasonable. Great client! Low class and disgusting!" He also accused the undersigned on November 24, 2020, of desiring to, "run up the bill for your communist client." And also added, "Make my day comrade!" [emphasis in the original.]* Attorney Amy M. Hanna, representing the defendant in *Larry Klayman v. Commie Girl Industries, Inc.*, (Wonkette) and *Rebecca Schoenkopf* [[Klayman vs Commie Girl Doc 41 506 2021](#)]

In pondering this *Make my day, Comrade!* challenge, I discovered it echoed the tone of voice of billionaire and philanthropist **Richard Mellon Scaife**, who at one time was the chief financial donor to Larry Klayman's *Judicial Watch* group.

Journalist Karen Rothmyer related the following anecdote of her personal encounter with Scaife, for the July/August 1981 *Columbia Journalism Review*, which can be accessed in a [WayBack Machine record of her Citizen Scaife article \(Part 6\)](#). She wrote:

*Richard Scaife rarely speaks to the press- After several unsuccessful efforts to obtain an interview, this reporter decided to make one last attempt in Boston, where Scaife was scheduled to attend the annual meeting of the First Boston Corporation.*

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*Scaife, a company director, did not show up while the meeting was in progress. Reached eventually by telephone as he dined with the other directors at the exclusive Union Club, he hung up the moment he heard the caller's name. A few minutes later he appeared at the top of the Club steps. At the bottom of the stairs, the following exchange occurred:*

*"Mr. Scaife, could you explain why you give so much money to the New Right?"*

*"You fucking Communist cunt, get out of here."*

*Well. The rest of the five-minute interview was conducted at a rapid trot down Park Street, during which Scaife tried to hail a taxi. Scaife volunteered two statements of opinion regarding his questioner's personal appearance – he said she was ugly and that her teeth were "terrible" – and also the comment that she was engaged in "hatchet journalism." His questioner thanked Scaife for his time. "Don't look behind you," Scaife offered by way of a goodbye.*

*Not quite sure what this remark meant, the reporter suggested that if someone were approaching it was probably her mother, whom she had arranged to meet nearby.*

*"She's ugly, too," Scaife said, and strode off.*

*The Portrait of The Legal Illusionist: Analyzing the "negative space"*

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In today's *Tracking the Leopard Meroz* article, I want to overlay our study of the words which paint a portrait of *The Legal Illusionist* with the artistic concept of *negative space*. Over fifty years ago, Gestalt therapists used the *Rubin Vase* painting shown below to illustrate our flawed ability to perceive reality. The Rubin vase, when viewed in the foreground is simply a vase. But an intense observation of the background ( negative space), reveals a silhouette of two faces.

[REPORT THIS AD](#)

A May 1, 2016 Dailykos.com Opinion piece, *The People Who Taught You to Hate Hillary, Part I: Judicial Watch*, noted, “The truth is, few stories end up in the media by accident. Many are the result of well-funded groups promoting particular items and convincing reporters to run with them...They (i.e. Judicial Watch) have indeed gone to court in pursuit of the Clintons many, many times, including 18 major lawsuits during Bill Clinton’s administration. These endless lawsuits and FOIA requests are designed to drive the news cycle, and at that game, Judicial Watch is a master.”

“Judicial Watch’s method is to relentlessly pursue information that can in any way be used against its political targets, to aim this information – even if partial, misleading, or flat out wrong- at conservative media outlets from Breitbart to Fox, which generate hype and get Republican office holders talking about them, forcing mainstream media to get into the game or else be accused of cover-ups, ‘liberal biases’, etc. This dynamic unfortunately leads to some very poor reporting.”

#### *History and Contexts*

Larry Klayman and I are near in age, and as part of the post-World War II generation, we have witnessed the same historical events which serve as the broader context of our personal lives.

The reality of a nuclear war between the United States of America and the Communist USSR in the fifties and sixties caused many of those who came of age during World War II to assist the CIA in information gathering for national security reasons.

Against this *Russian/Communist Menace* focal point, a “deceptive war of words” became the negative space which years later has been amplified by worldwide internet communications.

Attorney Larry Klayman wrote about his family history for a December 25, 2020 article for World Net Daily (WND) titled, [If it's good enough for Jesus, it's good enough for me.](#) He stated that his “grandfather Isadore ‘Izzy’ Klayman escaped from a small village near Odessa in the Ukraine just a few years after the Bolshevik Revolution. His father, Meyer, had been smuggled out of what then was part of Russia a few years earlier, and landed in Philadelphia, Pennsylvania, getting a job in a meatpacking plant as a butcher. Indeed, this was the family trade back in old country. Saving money, Meyer later sent for his wife, my great grandmother, Bubba Raisal, and young Izzy and his sister Rose, who as Jews would have had a ‘guaranteed’ long life expectancy in the USSR, given the intense anti-Semitism of the Communists and their historic persecution in Russia.”

Given this backstory, it does not surprise me that Larry Klayman has a strong disregard for Communists. I understand this sentiment, and am no friend of Communism. Back in the late eighties, when the USSR was still a tightly closed nation, I was involved with Christians who risked their lives to smuggle Russian New Testaments and Bibles to churches within this Communist stronghold. My efforts involved mailing New Testaments to brave Russian individuals who had the courage to send their name and address to an underground radio station, in order to possess a copy of the Scriptures.

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Thus, I find it disconcerting that Larry Klayman has firmly entrenched himself with Jason Goodman of *Crowdsource the Truth*, who along with his regular guest, Charles Ortel, are frequent contributors to the Kremlin propaganda site, *Sputnik News*. [see March 20, 2021, *Tracking the Leopard Meroz* article, [“Crowdsource The Truth’s “Elephant In The Room”: The Connection to the Russian Propaganda Site-Sputnik News”](#).]

Although I seldom view CSTT broadcasts anymore, according to Document 99 of the *National Academy of Television Arts and Sciences vs. Multimedia System Design* (aka Jason Goodman), Dave Sweigert claims that, “Mr. Klayman appears on average in 30% of all CROWDSOURCE THE TRUTH broadcasts...”.

What accounts for this peculiar alliance between Klayman and Goodman; this willful blindness of Klayman to the *beliefs, rooted in action*, of these two CSTT “Make my day” comrades of a Kremlin propaganda news organization?

For a number of years on *Crowdsource The Truth*, Charles Ortel, discussed his research into the Clinton Foundation. In parallel with this, Larry Klayman, during his *Judicial Watch* period, launched 18 lawsuits against the Clintons, which reportedly

cost the United States taxpayers around \$80 million to



"Not to worry, I've handled hundreds of cases like this and the way I see it, I'm bound to win one sooner or later."

litigate.

The fruit of these lawsuits, according to a Larry Klayman court affidavit, was that "a court ruled that President William Clinton committed a crime during the Filegate Litigation. I also triggered the famous Chinagate scandal in a Freedom of Information Act, 5 U. S. C. §552 et seq., which gave rise to Judicial Watch ultimately being awarded almost a million dollars. I filed cases which ended Bill and Hillary Clinton's attempted illegal purchase at below market rates for their mortgage of their home at Chappaqua, New York and ended the illegal payment of legal fees to the Clintons by State Farm, which was a form of bribery." [[Corsi vs Infowars Doc 74-1 805 2021](#), see Exhibit 3 Affidavit of Larry Klayman.]

#### *Resolution of the Filegate litigation*

Concerning the last "Filegate" lawsuit to be resolved, after 14 years of litigation, a 28 page precedential opinion was published in *Alexander vs. FBI*, (United States District Court of the District of Columbia), on [March 9, 2010, by Judge Royce C. Lamberth](#).

Senior U. S. District Judge Lamberth concluded: "After years of litigation, endless depositions, **the fictionalized portrayal of this lawsuit and its litigants on television, and innumerable histrionics**, this Court is left to conclude that with this lawsuit, to quote Gertrude Stein, "there's no there there." While this Court seriously entertained the plaintiffs' allegations that their privacy had been violated and indeed it was, even if not in the sense contemplated by Privacy Act after ample opportunity, **they have not produced any evidence of the far-reaching conspiracy that sought to use intimate details from FBI files for political assassinations that they alleged**. The only thing that they have demonstrated is that this unfortunate episode about which they do have cause to complain was exactly what the defendants claimed: nothing more than a bureaucratic snafu." [bolding added.]

"As such, the government's motion for summary judgment shall be granted in a separate order to be issued today and the plaintiffs' cross-motion for summary judgment shall be denied."

*Richard Mellon Scaife*

One of the major funders of the *Judicial Watch* legal efforts against the Clintons was Richard Mellon Scaife, heir to the Mellon family fortune consisting of investments in Mellon Bank, Gulf Oil, and Alcoa.

Scaife was the publisher of *The Pittsburgh Tribune-Review*. He also once owned the *Sacramento Union*, published by Joseph Farah, who became the launching point for the *Western Journalism Center* (WJC), largely funded by Scaife's *Carthage Foundation*. Joseph Farah started an internet newspaper in 1997 called *World Net Daily.com*, which published the article written by Larry Klayman on his family history.

Richard Mellon Scaife, who died in 2014, donated **\$8,115,000** through his family foundations from 1985-2005 to Larry Klayman's *Judicial Watch* organization.



**MEDIA TRANSPARENCY** 

the money behind conservative media

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**AGGREGATED GRANTS FROM THE SCAIFE FOUNDATIONS**

### Aggregated Grants from the Scaife Family Foundation, Carthage Foundation, Allegheny Foundation and the Sarah Scaife Foundation

For years:

1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005

Total of **\$455,552,216**

Name	Total
Heritage Foundation, The	23,096,640
Free Congress Research and Education Foundation, Inc.	17,437,000
Institute for Foreign Policy Analysis, Inc.	11,591,000
Hoover Institution on War, Revolution and Peace	9,768,900
Center for Strategic and International Studies	8,878,000
Intercollegiate Studies Institute, Inc.	8,804,800
Judicial Watch	8,115,000
Carnegie Institute	7,176,375
Brandywine Conservancy, Inc.	6,942,000
American Enterprise Institute for Public Policy Research	6,776,000
Landmark Legal Foundation	6,760,000
Social Philosophy and Policy Foundation	6,450,000
David Horowitz Freedom Center	6,400,000

### *Dynastic Families, newspapers, political operatives*

Given the major funding of Judicial Watch by the dynastic family foundations run by Richard Mellon Scaife, it is interesting to observe how Jason Goodman dealt with Adam

Sharp's family legacy in the context of the National Academy of Television Arts and Sciences trademark and libel lawsuit against his corporation, Multimedia System Design. Adam Sharp's father was broadcast journalist Roger Sharp, who won a national Emmy award in the 1960's covering the civil rights movement, and four Emmy awards when he worked for WABC-TV in New York in 1972.

When President John F. Kennedy was assassinated in Dallas, Texas on November 22, 1963, I was thirteen, and I can still vividly recall ABC Correspondent Roger Sharp's wonderful style of reporting, his choice of words and intonation, and calm demeanor in relating the shocking events of the murder of both Kennedy and Oswald. Adam Sharp has memorialized his father's reporting in [The Roger Sharp Archive](#).

Paragraph 43 in the September 4, 2020, Complaint [[National Academy of Television v Crowdsource the Truth Doc 1 904 2020](#)] stated, "Defendant also posted YouTube videos that spread falsehoods about Mr. Sharp and his father (noted journalist Roger Sharp) alleging that their professional careers were the products of nepotism, corruption, and CIA-led propaganda campaigns."

The Plaintiff identified one Jason Goodman video, (time marks of 1:23:52 to 1:27:31), saying that a false implication was made that "Adam Sharp's father, Roger Stone, spread propaganda on CBS and in exchange his son, Adam Sharp, could one day 'run the Emmys'."

Goodman supplied a transcribed version to the Court in Document 12 as shown in the screenshots below. [[National Academy of Television v Crowdsource the Truth Doc 12 1013 2020](#)]. Note that the underlined statements were made by Jason Goodman to emphasize his contention that his statements were "speculation, rhetorical questions, and trying to connect the dots. Speculation and raising questions are by definition non-libelous".

---

76. Paragraph 76 is denied. Under applicable New York law, a libel claim requires the Plaintiff to state verbatim the challenged statement – not just paraphrase the Plaintiff's subjective interpretation of the words. Quoted below is the verbatim challenged statement identified in paragraph 43 of the EMMY's complaint (the "Goodman Statement"):

I've been talking a lot about the Emmys lately and how the President of the National Academy of Television Arts and Sciences personally has struck a video on the Jason Goodman YouTube channel that right now is preventing 114,000 subscribers from being notified about this video. It's going to reduce the number of people who hear your message about Cuomo, who hear Carter Page's message about his book and the things that he was talking about.

**And it was a remarkably strategic attack from a guy who used to be a principal of well a highly placed executive at Twitter who was in charge of news politics and elections.** Now Twitter ostensibly started as some stupid app on the phone that grew to such prominence. But I don't think so. I think they had designs to do something with it from the beginning.

And you know Charles, I've, I've, learned something today that I really want to share with everybody that adds even more intrigue to this story. **And I'm not suggesting anything,** but we've spoken about how the president of television's father was a news correspondent for CBS and ABC but I did not realize that he was the individual who told the world that Lee Harvey Oswald is dead. He was in the Dallas police station when Oswald was shot. And he featured very prominently in the reporting on the JFK assassination.

Now I know a lot of people who watch Crowdsource The Truth are aware of the Frank Church Senate hearings where he was investigating the CIA in 1975 or, 1975, well after this. And William Colby, the director of the CIA, admitted to Operation Mockingbird. He declassified it. He said that they were paying news people. I don't know if Roger Sharp was named as a participant in that program but it certainly seems curious and it takes me back to what you were raising about these dynastic families. Is this a situation where someone puts pressure on somebody and says look either you can be marginalized and have the 1963 equivalent of your YouTube channel being struck so that you never get off the ground or you can tell stories that we want you to tell you're going to win many Emmys? You're going to rise to prominence and maybe someday your son could run the Emmys? I'm not saying that's what happened.

But we can hypothesize about a situation where perhaps that would happen and this guy Adam Sharp who struck the channel, he's giving out news Emmys, sports Emmys. So I can imagine a world where a Jason Goodman is working at NBC News reporting on how the Dallas police tested Lee Harvey Oswald's hands and there was no gunshot residue on his face, no indication that he fired a rifle that day. If Lee Harvey Oswald had ever had a trial and evidence was fairly presented he would have surely been exonerated. But reporting like this made sure that he's gone down in history as the murderer of JFK and perhaps that secret is being jealously protected to this day because disciples of that regime – the Bushes then the Clintons then the Obamas to today need to be protected by these dynastic political and media families. Because these award shows, that is where the politics of entertainment meet. And I'm just saying there's something to look at here.

What is interesting about the above comments which Jason Goodman made to Charles Ortel in his broadcast is the reference to "dynastic families" and his conclusion that the "Bushes, then the Clintons, then the Obamas to today need to be protected by these dynastic political and media families..." .

I should add that it is not only the politicians who hold powerful offices that are supported by extremely wealthy dynastic families, **but also lawyers with private foundations that receive thousands of dollars in donations from these same sources.** As noted earlier, in the *Filegate* lawsuit, Judge Lambreth chastised the plaintiff **who was represented by Larry Klayman of Judicial Watch**, saying "After years of litigation, endless depositions, the fictionalized portrayal of this lawsuit and its litigants on television, and innumerable histrionics, this Court is left to conclude that with this lawsuit, to quote Gertrude Stein, 'there's no there, there.'"

Surely any skilled, ethical lawyer would have been able to see the flawed arguments and lack of material facts in these lawsuits early on in these cases, and would have been able to predict the final outcome with relative ease.

*So why does Jason Goodman, who rails against LAWFARE tactics and funding by dynastic families, NOT criticize Larry Klayman's Judicial Watch history of lawfare tactics and multimillion dollar funding by the Scaife foundations? And why is Larry Klayman NOT critical of Jason Goodman and Charles Ortel's relationship with the Kremlin propaganda site, Sputnik News?*

Jason Goodman attached to his response to the NATAS complaint, as Exhibit 12-1, a Carl Bernstein article on the *CIA and the Media* (Operation Mockingbird). [[National Academy of Television v Crowdsource the Truth Doc 12-1 1013 2020](#)]. This lengthy article provides the historical background of the ethical motivations of Americans, who were concerned for national security in a post World War II era, and therefore assisted the CIA in information gathering.

As an aside, I give Jason Goodman credit for noting the embarrassing error made by the NATAS legal team when they wrongly stated that Operation Mockingbird, was "an alleged conspiracy by the CIA to control people's minds using torture and psychoactive drugs and related murder allegations". [NATAS Complaint, paragraph 76(b).]

*Which brings us to another point about the anti-Clinton campaign: Speaking of drugs and murder allegations....*

On April 1, 1999, *The Public Eye*, a publication of Political Research Associates, featured an article by Chip Berlet titled, [Clinton, Conspiracism, and the Continuing Culture War – What is Past is Prologue](#). Berlet stated, "In March 1999, Judicial Watch's main web page included a teaser for an article on the 'Clinton body count.' This macabre charge is a staple in the conspiracist cupboard: List of deceased persons reportedly associated with the Clinton Administration left on Linda Tripp's chair by Monica Lewinsky, according to Ms. Tripp's Filegate testimony. (The origin of the handwriting is unknown. Ms. Tripp perceived this as a threat to her.)"

Two years earlier, in the March 1997 edition of *The American Spectator*, an investigative writer, James Ring Adams, published an interesting article called, *The Final Crash of Larry Case: The demise of a wacky Little Rock private eye who used to spy on (and for) Bill Clinton and the Arkansas machine*.

Two familiar names come up in this 22 year old article: Larry Nichols and Wayne Willot.

One of Jason Goodman's former regular guests on *Crowdsource the Truth* was Larry Nichols, who claimed to be a hitman for Clinton, and then backtracked his statement. *Tracking the Leopard Meroz* wrote about this incident in an August 9, 2015 article, [Doug Hagmann: A Man in Deep Trouble](#).

Another man related to Larry Nichols during 1997, when Scaife was funding his Arkansas Project to dig up the dirt on Clinton, is **Wayne Willot**, who was featured about 6 years ago as a regular guest on the Hagmann Report as *W The Intelligence Insider*. Willot is presently known by the Alternative Media conspiracy crowd as **Juan O Savin**. [see *Tracking the Leopard Meroz* article 3/9/2020, [ACH DU LIBER, Thomas](#)

Schoenberger! Are You Speaking in Code to the Original American James Bond, Wayne Willot?

James Ring Adams began his American Spectator article, “When the Maumelle, Arkansas district court on a recent Thursday evening found former private eye Larry Case guilty of drunken driving and resisting arrest, it wrote another bizarre footnote to Bill Clinton’s political career. Case achieved notoriety in both the ’92 and ’96 presidential campaigns by peddling videotapes he claimed showed Clinton womanizing and using drugs. At the same time, there were rumors that Case was taking money from the Democratic National Committee. **As with much in Case’s strange life, his relations with Clinton and the Clinton camp were so involuted and ambiguous that some of his compatriots seriously thought he was a double agent.**” [bolding added.]

This article adds, “Case had even higher connections. An *American Spectator* investigation reveals that Case had frequent access to then-Governor Clinton’s head of the state police, in spite of his own dubious reputation...Whether or not Case acted as a double agent in peddling anti-Clinton material during the presidential campaigns, his trajectory sheds light on a sinister side of Clinton’s own career. As governor, Clinton eagerly used a demi-monde of private eyes and shady operators for political intelligence and, by some accounts, intimidation. Case declined to be interviewed for this article without clearance from his lawyer....But a picture of his career emerges from boxes full of files, tapes, and transcripts accumulated in the past two decades by the Arkansas Board of Private Investigators and Private Security Agencies, the regulator of the private security industry.”

Near the end of this article, Adams observes, “Rumors about Case’s tapes, and a million dollar asking price, continued to circulate during the 1996 campaign, but the market for his material went into a deep depression.”

And now we get to the intriguing part of this story, as the author notes, “By this time, Case was absorbed with an emotional crisis, apparently triggered when he concluded that he was being followed by a mysterious stranger. No hallucination, **his tail was a freelance researcher named Wayne Willot**, who occasionally contributed to the talk show of presidential son Michael Reagan. **Last June, Willot was visiting Larry Nichols of Conway, Arkansas, a fount of anti-Clinton material, when they discovered that Case had staked out Nichols’s house.** Nichols was convinced that Case had been hired to harass him ‘by the Democratic National Committee and Betsey Wright,’ although he said he wasn’t free to release corroborating evidence. While Case followed Nichols, Willot began to tail Case.” [bolding added.]

“Around June 11, Case noticed his shadow, and freaked out. He began to visit the state police headquarters of the P. I. Board to complain. He also left a threatening message on the answering machine at Floyd Brown’s Citizens United group, which staffers promptly forwarded to Independent Counsel Kenneth Starr.”

Richard Mellon Scaife poured considerable money into *The American Spectator* to write articles against the Clintons. That funding ended when one writer for TAS wrote a negative review of Christopher Ruddy’s book, which highly displeased Scaife.

When Scaife died in 2014, according to Politico writer Kenneth P. Vogel, in an article dated 8/2/2014, [Clinton Eulogizes Scaife](#), Christopher Ruddy “and the late former New York City Mayor Ed Koch helped broker a July 2007 meeting with Scaife and the former president in the Clinton Foundation’s Harlem office, and Scaife donated more than \$100,000 to the foundation. Still, Scaife raised eyebrows by praising Hillary Clinton during her 2008 campaign for the Democratic presidential nomination, and his Tribune-Review later endorsed her over Barack Obama ahead of the Pennsylvania primary.” So after spending millions on anti-Clinton campaigns, including funding *Judicial Watch* and attorney Larry Klayman’s 18 legal actions against the President which cost the taxpayers \$80 million, *the public is now expected to praise Clinton’s forgiveness of Scaife?*

*The American Spectator* article concludes with this wisdom: “Case’s sordid career poses questions of national importance. **His sludge-dredging talents found a ready audience among a circle of politicians who found it in their interest to protect him from the normal course of the law.** We have been accused of disreputable muckraking ourselves, but we should underscore that **scandal-mongering is infinitely more serious when it is sponsored by the power of the state.** After trying to exploit Case and finding him wanting, the mainstream press may deplore the way he tried to peddle dirt to Clinton’s ‘extreme right-wing’ opponents. We, for one, savor the irony that he owed his career to the protection of Clinton and his political cronies.” [bolding added.] As a side note on *Wayne Willot aka Juan O Savin*, there is a video on robertdavidsteele.com dated January 24, 2021, in regard to [Steele having dinner with Juan O Savin](#). The video is described as follows:

Juan O. Savin (P) is working closely with key people documenting the treason and conspiracy surrounding the massive election fraud committed by the Deep State and its agents inclusive of both Democratic and Republican governors, and media co-conspirators notably Associated Press and the New York Times. In this short video, under 20 minutes, he addresses foreign interference by the United Kingdom, available forensics, the compromise of the courts, confused legislators, and what may or may not happen from 6 January. Most significantly he states that the President is ready to used Martial Law and the Insurrection Act — the #1 Wood in the President’s golf bag, and that inauguration may be delayed. He has previously stated that it is an impossibility for Biden-Harris to ever be inaugurated.

<https://phibetaiota.net/2020/10/juan-o-savin-kid-by-the-side-of-the-the-road/>  
<https://phibetaiota.net/2020/12/roseanne-barr-and-juan-o-savin-on-election-fraud-and-more/>  
<https://phibetaiota.net/2020/12/unrig-video-1946-juan-o-savin-trump-will-not-concede-biden-will-not-be-inaugurated-bigtech-will-go-to-jail/>  
<https://phibetaiota.net/2020/12/unrig-video-3454-juan-o-savin-on-election-tribunals-soul-of-america/>

*Apparently in this Alternative world, operatives are recycled, remolded and given new anonymous names without regard to any ethical principles.*

As Carl Bernstein noted in his *The CIA and Media article*, “CIA officials almost always refuse to divulge the names of journalists who have cooperated with the Agency. They say it would be unfair to judge these individuals in a context different from the one that

spawned the relationships in the first place. ‘There was a time when it wasn’t considered a crime to serve your government,’ said one high-level CIA official who makes no secret of his bitterness. **‘This all has to be considered in the context of the morality of the times, rather than against latter-day standards—and hypocritical standards at that.’** [bolding added.]

*Hypocritical, indeed.*

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## **EXHIBIT FIVE**

----- Original Message -----

From: Spoliation Notice <[spoliation-notice@mailbox.org](mailto:spoliation-notice@mailbox.org)>  
To: "pdsradio@aol.com" <[pdsradio@aol.com](mailto:pdsradio@aol.com)>, "Dan.Keashen@camdencounty.com"  
<[Dan.Keashen@camdencounty.com](mailto:Dan.Keashen@camdencounty.com)>, "info@email.futurenewsletters.com"  
<[info@email.futurenewsletters.com](mailto:info@email.futurenewsletters.com)>, "news-q2@law360.com" <[news-q2@law360.com](mailto:news-q2@law360.com)>,  
"newsletters@governing.com" <[newsletters@governing.com](mailto:newsletters@governing.com)>, ROBERT JAKUBOWSKI  
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Nash <[Jeff.Nash@camdencounty.com](mailto:Jeff.Nash@camdencounty.com)>, Route Fifty Today <[news@e.routefifty.com](mailto:news@e.routefifty.com)>, Jen  
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<[ben@homelandsecuritynewswire.ccsend.com](mailto:ben@homelandsecuritynewswire.ccsend.com)>, Granicus Events <[info@granicus.com](mailto:info@granicus.com)>,  
Neuvoo <[job@neuvoo.com](mailto:job@neuvoo.com)>, RTTOIC <[RTTOIC@camdencountypd.org](mailto:RTTOIC@camdencountypd.org)>, Lindsey  
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"mayor@phila.gov" <[mayor@phila.gov](mailto:mayor@phila.gov)>, "jame  
s.kenney@phila.gov" <[james.kenney@phila.gov](mailto:james.kenney@phila.gov)>, "mark.squilla@phila.gov"  
<[mark.squilla@phila.gov](mailto:mark.squilla@phila.gov)>, "darrell.clarke@phila.gov" <[darrell.clarke@phila.gov](mailto:darrell.clarke@phila.gov)>,  
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"derek.green@phila.gov" <[derek.green@phila.gov](mailto:derek.green@phila.gov)>, "al.taubenberger@phila.gov"  
<[al.taubenberger@phila.gov](mailto:al.taubenberger@phila.gov)>, "questions@phlvisitorcenter.com"  
<[questions@phlvisitorcenter.com](mailto:questions@phlvisitorcenter.com)>, "nwoods@phlvisitorcenter.com"  
<[nwoods@phlvisitorcenter.com](mailto:nwoods@phlvisitorcenter.com)>, "hmurphy@phlvisitorcenter.com"  
<[hmurphy@phlvisitorcenter.com](mailto:hmurphy@phlvisitorcenter.com)>, "hello@pressreview.net" <[hello@pressreview.net](mailto:hello@pressreview.net)>,  
"alee@phlvisitorcenter.com" <[alee@phlvisitorcenter.com](mailto:alee@phlvisitorcenter.com)>, Spoliation Notice <[spoliation-notice@mailbox.org](mailto:spoliation-notice@mailbox.org)>

Date: 07/03/2021 2:56 AM

Subject: Re: WARNING: Militia Group to host 3rd Continental Congress in Philadelphia July 5

Update:

The Larry Klayman (militia extremists) will be meeting at:

<https://www.phlvisitorcenter.com/>

July 5th and 6th, 9 am to 4 pm

Updated police report and photo attached of Jason Goodman (usually armed).

> On 07/03/2021 2:04 AM Spoliation Notice <[spoliation-notice@mailbox.org](mailto:spoliation-notice@mailbox.org)> wrote:  
>  
>  
> REF: <https://13wham.com/news/nation-world/political-group-to-host-3rd-continental-congress-in-philadelphia-july-5>  
>  
> IMMEDIATE RELEASE  
>  
> Larry Klayman, presently suspended from practicing law in the Circuit Court for the District of Columbia, is bringing his alt-right pro-Trump extremists to Philadelphia. The group is essentially a mixture of anti-government militia.  
>  
> His main sidekick is Jason Goodman (police report attached). Mr. Goodman is from New York City and promotes Klayman on YouTube broadcasts. Mr. Goodman is credited with shutting down the Port of Charleston, S.C. due to a dirty bomb hoax (see attached police report).  
>  
> Law enforcement should be prepared for flash-point mob violence that may occur.  
>  
> Klayman may be best known for suing his own mother, threatening U.S. Supreme Court jurists, being late on child support (\$72,000 aka "dead beat dad") and allegations that he molested his own children in Ohio.  
>  
> Lately, Klayman has been pushing U.F.O. narratives to raise money as he is apparently broke (sanctioned for not returning funds to a former client).  
>  
> Background:  
>  
> <https://www.mediamatters.org/sinclair-broadcast-group/sinclair-broadcast-group-airedin-interview-conspiracy-theorist-it>  
>  
> <https://www.splcenter.org/fighting-hate/extremist-files/individual/larry-klayman>  
>  
> <https://www.sdyny.info/post/christian-jew-larry-klayman-now-believes-in-ufos-jason-goodman-friendship-questioned>

## 6 Attachments



Who is Spoofing the #SethRichFiles

13,871 views

497 146 SHARE SAVE ...

Jason Goodman  
Streamed live on Jun 3, 2017

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Category News & Politics



Ghost Town USA – Nowhereville We Are Open with Special Guest John Cullen

2,245 views • Streamed live on Apr 12, 2021

192 6 SHARE SAVE ...

 Crowdsource the Truth 3

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Defendant

**Jason Goodman**  
 252 7th Ave, #6s  
 New York, NY 10001  
 323/744-7594

AGENCY I.D.		INCIDENT REPORT										CASE NUMBER		NCIC		
SC0101300		South Carolina State Port Authority PD										21-064		INQ.	ENTD.	
EVENT	INCIDENT TYPE					COMPLETED		FORCED ENTRY		PREMISE TYPE		UNITS ENTERED		TYPE VICTIM		
	1. 90Z - Suspicious Person					<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		45(Dock/Wharf/Freight/Modal Terminal)				<input type="checkbox"/> Individual		
	2.					<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO						<input type="checkbox"/> Business		
	3.					<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO						<input type="checkbox"/> Financial Ins		
	INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER) 400 Long Point Road, Mount Pleasant, SC										ZIP CODE 29464-		WEAPON TYPE			
	INCIDENT DATE		24 HR. CLOCK	TO	DATE	24 HR. CLOCK	DISP. DATE	DISP. TIME	TIME ARRIVED	DEPART. TIME	LOCATION NO.					
	02/13/2021		11:12		02/13/2021	11:25	02/13/2021	11:00	11:08	11:25	P-41					
	COMPLAINANT'S NAME (LAST, FIRST, MIDDLE)					RELATIONSHIP TO SUBJECT #1 #2 #3		RESIDENT	RACE	SEX	AGE	ETH.	HOME PHONE	EMPLOYER PHONE <input type="checkbox"/> (843) 577-8176		
	400 Long Point Road					CITY Mount Pleasant		STATE SC	ZIP CODE 29464-		LOCATION NO.					
	VICTIM'S NAME (LAST, FIRST, MIDDLE) South Carolina Ports Authority					RELATIONSHIP TO SUBJECT #1 #2 #3		RESIDENT	RACE	SEX	AGE	ETH.	HOME PHONE	EMPLOYER PHONE <input type="checkbox"/> (843) 577-8135		
HEIGHT	WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.								D <input type="checkbox"/> E				
ADDRESS 200 Ports Authority Drive					CITY Mount Pleasant		STATE SC	ZIP CODE 29464-		LOCATION NO. P-41						
VISIBLE INJURY (VICT. 1) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLAIN -					COMPLAINT OF NON-VISIBLE INJURIES: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO											
VICTIM (NO. 1): <input type="checkbox"/> NONE <input type="checkbox"/> USING: ALCOHOL <input type="checkbox"/> DRUGS <input type="checkbox"/> TYPE:																
TWO-MAN VEH. <input type="checkbox"/> ONE-MAN VEH. <input type="checkbox"/> DETECTIVE/SPL ASMT. <input type="checkbox"/> OTHER <input type="checkbox"/>					ALONE <input type="checkbox"/>	ASSISTED <input type="checkbox"/>	* J -- This Jurisdiction		S -- State	O -- Out of State	U -- Unknown					
<input type="checkbox"/> SUSPECT		NAME, (LAST, FIRST, MIDDLE)			RACE	SEX	AGE	ETH.	DATE OF BIRTH	HEIGHT	WEIGHT	HAIR	EYES			
<input type="checkbox"/> RUNAWAY		Goodman, Jason D														